



COQUILLE INDIAN TRIBE

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October 9, 2014

Federal Communications Commission
Washington, DC 20554

Re: FCC Proposed Changes to Historic Preservation Rules for Wireless Infrastructure, WT
Docket No. 13-238

Thank you for the opportunity to comment on the proposal to improve the FCC's Section 106 review process for small cell and Distributed Antenna Systems (DAS) deployments.

NEPA and NHPA were enacted to protect our environmental and cultural resources, including prehistoric sites, historic structures, and landscapes. DAS and small cell systems offer a unique alternative to large cellular towers. However, a categorical exclusion from NEPA and NHPA Section 106 are unwarranted and ill-advised. The Coquille Indian Tribe (Tribe) concurs with the concerns expressed by many local governments (including the City of Eugene, Oregon, the League of California Cities, the California State Association of Counties, and Scan NATOA).

DAS systems most certainly still have an adverse visual effect on culturally important landscapes and historic properties in the vicinity. The landscape, as well as many historic and cultural properties, in the area have religious and cultural significance to the Tribe. Though the effect on a single structure may be small, the cumulative effect on the environment, the viewshed, and historic districts as a whole may be significantly greater than anticipated. Furthermore, "substantial change" is not one-size fits all. A landscape scale approach should be used when considering effect. Local governments are entitled to review requests and should be afforded time to address concerns within the area of potential effect.

In addition, the cumulative effect of Radio Frequency emission on the biosphere must be addressed. Migratory birds, fish, and insects are shown to be negatively affected by RF and EMF emission. The Tribe has established several wildlife rehabilitation areas to reestablish and protect native plant and animal species. Protection of these areas is of paramount concern.

The Coquille Indian Tribe urges the Federal Communications Commission to reject proposals to broaden exemptions for NEPA and NHPA. By providing these comments, the Tribe is not relinquishing its right to consult on NEPA and NHPA projects in the future. Thank you again and feel free to contact me or our Executive Director, George Smith, at (541) 756-0904 if you have any questions.

Best,

A handwritten signature in black ink, appearing to read 'KR', is positioned above the typed name.

Kassandra Rippee, MA
Archaeologist/THPO
Coquille Indian Tribe